

The Honorable Robert Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MOHAMED A. HUSSEIN, an individual, and  
HASSAN HIRSI, an individual,

Plaintiffs,

vs.

AIR SERV CORPORATION, a foreign  
corporation

Defendant.

Case No. 2:16-cv-00278-RSL

STIPULATED MOTION TO MODIFY  
PRELIMINARY APPROVAL TIMELINE  
AND SUBJOINED ORDER

The Class Representatives and Defendant ABM Industries, Inc. (Air Serv) jointly move the Court to modify its Order Granting Preliminary approval to allow minor modifications to the Class Notice and to allow additional time to distribute the Class Notice. The parties make this motion because additional information obtained by Class Counsel increases the percentage of back wages and sick pay which Class Members will recover as part of this settlement, and because the Administrator (Simpluris) requires additional time to set up the database and mailing list for distribution of the Class Notice.

Therefore, the parties request: (1) the approved Class Notice be modified to reflect a recovery percentage of 98.9%; and (2) that Section M – Timeline in the Court's Order Granting Preliminary Approval (Dkt. #44), be modified as follows:

STIPULATED MOTION TO MODIFY  
PRELIM. APPROVAL TIMELINE - 1

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ACTION	DATE
Preliminary Approval Order Entered	July 27, 2018
Class Counsel's Fee Motion Submitted	August 17, 2018
Initial Notice Mailing Date	August 31, 2018
Notice Deadline	September 24, 2018
Exclusion/Objection Deadline	October 24, 2018
Final Approval Brief and Response to Objections	November 8, 2018
Final Approval Hearing/Notice Date	December 5, 2018
Final Approval Order Entered	At the Court's discretion.

The parties believe the currently-set Final Hearing date of December 5, 2018 provides sufficient time for Class Members to receive class notice and consider their available options, and therefore, request it not be modified.

DATED this 13th day of August, 2018.

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STIPULATED MOTION TO MODIFY  
PRELIM. APPROVAL TIMELINE - 2

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**SUBJOINED ORDER**

THE COURT, having considered the Parties' Stipulation Motion to Modify Timeline, and the parties' requests to: (1) modify the percentage of recovery reflected on the Class Notice, and (2) to modify the timeline for distribution of the Class Notice, HEREBY approves the parties' requests, and modifies the settlement timeline to reflect that proposed in the Parties' motion.

DATED this 17<sup>th</sup> day of August, 2018.

  
Robert S. Lasnik  
U.S. District Court Judge

**PRESENTED BY:**

**BADGLEY MULLINS TURNER PLLC**

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STIPULATED MOTION TO MODIFY  
PRELIM. APPROVAL TIMELINE - 3

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